

EXHIBIT A

DOCUMENT 1



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5/4/2015 5:21 PM

01-CV-2015-901794.00

CIRCUIT COURT OF

JEFFERSON COUNTY, ALABAMA

ANNE-MARIE ADAMS, CLERK

State of Alabama
Unified Judicial System
Form ARCiv-93 Rev.5/99

COVER SHEET
CIRCUIT COURT - CIVIL CASE
(Not For Domestic Relations Cases)

Case Number:
01-CV-201
Date of Filing:
05/04/2015

GENERAL INFORMATION

IN THE CIRCUIT OF JEFFERSON COUNTY, ALABAMA
EUGENE BAIRD ET AL v. PPG INDUSTRIES, INC. ET AL

First Plaintiff: ☐ Business ☒ Individual
☐ Government ☐ Other

First Defendant: ☒ Business ☐ Individual
☐ Government ☐ Other

NATURE OF SUIT:**TORTS: PERSONAL INJURY**

- ☐ WDEA - Wrongful Death
☐ TONG - Negligence: General
☐ TOMV - Negligence: Motor Vehicle
☐ TOWA - Wantonnes
☐ TOPL - Product Liability/AEMLD
☐ TOMM - Malpractice-Medical
☐ TOLM - Malpractice-Legal
☐ TOOM - Malpractice-Other
☐ TBFM - Fraud/Bad Faith/Misrepresentation
☐ TOXX - Other: _____

TORTS: PERSONAL INJURY

- ☐ TOPE - Personal Property
☐ TORE - Real Property

OTHER CIVIL FILINGS

- ☐ ABAN - Abandoned Automobile
☐ ACCT - Account & Nonmortgage
☐ APAA - Administrative Agency Appeal
☐ ADPA - Administrative Procedure Act
☐ ANPS - Adults in Need of Protective Services

OTHER CIVIL FILINGS (cont'd)

- ☐ MSXX - Birth/Death Certificate Modification/Bond Forfeiture
Appeal/Enforcement of Agency Subpoena/Petition to Preserve
☐ CVRT - Civil Rights
☐ COND - Condemnation/Eminent Domain/Right-of-Way
☐ CTMP - Contempt of Court
☐ CONT - Contract/Ejectment/Writ of Seizure
☐ TOCN - Conversion
☐ EQND - Equity Non-Damages Actions/Declaratory
Judgment/Injunction Election Contest/Quiet Title/Sale For
Division
☐ CVUD - Eviction Appeal/Unlawful Detainer
☐ FORJ - Foreign Judgment
☐ FORF - Fruits of Crime Forfeiture
☐ MSHC - Habeas Corpus/Extraordinary Writ/Mandamus/Prohibition
☐ PFAB - Protection From Abuse
☐ FELA - Railroad/Seaman (FELA)
☐ RPRO - Real Property
☐ WTEG - Will/Trust/Estate/Guardianship/Conservatorship
☐ COMP - Workers' Compensation
☒ CVXX - Miscellaneous Circuit Civil Case

ORIGIN: F ☒ INITIAL FILING

A ☐ APPEAL FROM
DISTRICT COURT

O ☐ OTHER

R ☐ REMANDED

T ☐ TRANSFERRED FROM
OTHER CIRCUIT COURT

HAS JURY TRIAL BEEN DEMANDED? ☒ Yes ☐ No

RELIEF REQUESTED: ☒ MONETARY AWARD REQUESTED ☐ NO MONETARY AWARD REQUESTED

ATTORNEY CODE: HIR005

5/4/2015 5:21:39 PM

/s/ ALEX RYAN HIRSCHFIELD

MEDIATION REQUESTED: ☐ Yes ☒ No ☐ Undecided

DOCUMENT 2



ELECTRONICALLY FILED
5/4/2015 5:21 PM
01-CV-2015-901794.00
CIRCUIT COURT OF
JEFFERSON COUNTY, ALABAMA
ANNE-MARIE ADAMS, CLERK

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
BIRMINGHAM DIVISION

EUGENE BAIRD AND
RHINO PRODUCTS INC.,

PLAINTIFFS,

v.

PPG INDUSTRIES, INC.,
PPG ARCHITECTURAL FINISHES,
INC., CHRIS SIDES, JOSEPH SMITH,
DAVE HINA, AND FICTITIOUS
PARTIES A, B and C, AND
FICTITIOUS PARTIES D, E AND F,
AND FICTITIOUS PARTIES G, H,
AND I,

DEFENDANTS.

Civil Action No.: _____

JURY TRIAL DEMAND

COMPLAINT

COMES NOW, Plaintiffs, Eugene Baird and Rhino Products, Inc. (Known hereinafter as "Plaintiffs") by and through counsel and files this Complaint against the Defendants PPG Industries, Inc., PPG Architectural Finishes, Inc., Chris Sides, Dave Hina, Joseph Smith and other fictitious Defendants (Known hereinafter collectively as "Defendants") and states as follows:

(Parties and venue)

1. Plaintiff Eugene Baird (hereinafter "Baird") is an individual over the age of 19 years and a resident of Jefferson County, Alabama.
2. Plaintiff Rhino Products, Inc. (hereinafter "Rhino") is a domestic company authorized to do business in the state of Alabama.

3. Defendant PPG Industries, Inc. (Hereinafter "PPG Industries") is a foreign corporation registered to do business in the State of Alabama.

4. PPG Architectural Finishes, Inc. (Shall also be referred to as "PPG Arch") is a foreign corporation registered to do business in the State of Alabama.

5. Defendant Chris Sides is an individual over the age of 19 and is a resident of the state of Alabama.

6. Defendant Dave Hina is an individual over the age of 19 and is a resident of the state of Alabama.

7. Defendant Joseph Smith is an individual over the age of 19 and an employee of Defendant PPG Industries.

8. Fictitious parties A, B, and C whether singular or plural, the person, firm, corporation, partnership or entities who or which caused or contributed to cause the damages complained of herein.

9. Fictitious Parties D, E, and F whether singular or plural, firms or corporations, partnership or other entities who or which were or may have been responsible for the actions, conduct or were the principal or agent of any of the named Defendants and who owed any duty to the Plaintiffs to not cause, inflict or otherwise procure the harm made basis of this lawsuit.

10. Fictitious Parties G, H and I, those persons, firms or corporations who engaged in a common scheme or plan with a pattern of racketeering activity on two (2) or more occasions within the past ten (10) years; did fix prices of certain commodities or articles; did limit the availability of certain commodities or articles; did employ an unlawful trust, combine, or monopoly with respect to Plaintiffs' business, whose identity is not presently known but who will be substituted by amendment when ascertained.

11. This Court has venue of this action pursuant to § 6-3-2, Code of Alabama 1975.
12. Plaintiffs have multiple claims for relief that are based on State and Federal law (RICO Claims). State courts have original jurisdiction to enforce the Civil RICO statute at 18 U.S.C. 1964 (C). *Tafflin v. Levitt*, 493 U.S. 455 (1990).

(FACTS)

13. Plaintiffs are in the business of buying and selling or otherwise transacting paints, paint products, paint related materials, and surface products.
14. Plaintiffs' primary place of business is located at 3507 6th Court South, Birmingham, AL 35222
15. Plaintiff Eugene Baird has been in the paint and surface products industry for almost thirty-five years.
16. In or around 1998, Baird began doing business with Defendants PPG and PPG Arch. (Hereinafter "PPG"), whereby he would buy paint, paint materials, paint related products and surface products with the intent of selling those products as a retailer or on the retail market.
17. Baird over the years subsequent to 1998, served as a major retailer and an authorized dealer for PPG through various businesses owned by Baird.
18. Baird would routinely get PPG products shipped to his place of business from 4261 W. White Road, Oakwood, GA 30566 and other locations, which would travel via interstate commerce as it would be shipped to Baird's business locations in Alabama.
19. During the time Baird sold PPG products as a dealer, the products were in high demand and Baird would routinely acquire PPG products from other merchants or dealers who had a surplus when Baird's inventory would become depleted or low.

20. Some of the merchants or dealers included Herman Helms at Colours Paint in Gadsden, AL, Tim Junkin at Rozar Auto Pain Supply, Inc. and Phillip Williams at The Paint Spot in Tuscaloosa, AL.

21. The Merchants were in the same or similar business as the Plaintiffs in buying and selling paints, paint products and surface products.

22. Baird would transact with the merchants as the president and CEO of Lakeview Paint, Inc. or Plaintiff Rhino Products, Inc. (Hereinafter known as "Rhino").

23. The Plaintiffs would also routinely transact business involving PPG products (paint, paint materials and paint related products) with the merchants previously mentioned and other businesses or individuals located in other states.

24. These other states included Florida, Mississippi, Georgia, and Kentucky.

25. In or around 2012, Baird had a disagreement or a dispute with PPG over a defective product which adversely affected a paint application on a certain building. PPG refused to address the issue and refused to provide reimbursement.

26. As a result of the conflict previously mentioned, PPG subsequently changed their business practices with Baird and drastically reduced doing business with Baird.

27. PPG subsequently opened a PPG retail store within the general area (within blocks) of Baird's place of business.

28. Sometime after PPG had opened up a new retail store in Birmingham, AL, the PPG retail store would sell the same or similar products sold by Plaintiffs at a lower price to customers including other dealers. These customers at times were the same customers who did business with the Plaintiffs.

29. Plaintiffs at the time, sought to obtain PPG products from other dealers and merchants at special prices offered by PPG. PPG would inquire of the merchants and dealers who have made such request for special prices.

30. When PPG would find out that Baird would make the requests for PPG products at special prices from dealers and merchants, PPG would instruct the dealers and merchants that the special priced products are not available for Baird or anybody associated with Baird. Eventually PPG stopped selling to Plaintiffs all together.

31. Also during the timeframe provided above, PPG acquired the Devoe Paint Company and interests connected therewith. PPG and other Defendants made it a point to tell the Plaintiffs that they made the acquisition.

32. Plaintiffs used to carry, buy, purchase and sell Devoe paints until PPG made its acquisition. The Plaintiffs subsequently stopped buying Devoe Paint because it was no longer available for the Plaintiffs to purchase because the Defendants would not sell to the Plaintiffs.

33. Also during the 2012 to 2015 period of time, PPG and other Defendants employed a scheme or a common plan or engaged in a common enterprise to thwart Plaintiffs from being able to transact business involving PPG and Devoe products with certain merchants including Colours Paint in Gadsden, Rozar Auto Paint Supply, Inc. in Birmingham, AL and The Paint Spot in Tuscaloosa, AL.

34. Plaintiffs learned that PPG and other Defendants told Tim Junkin at Rozar Auto Paint Supply, Inc. on multiple occasions that he was forbidden to transact or sell any PPG products to the Plaintiffs. Herman Helms at Colours Paint in Gadsden, and Phillip Williams at The Paint Spot in Tuscaloosa, AL, were also told the same or there would be consequences if they sold to the Plaintiffs.

35. More specifically during 2012-2015 on multiple occasions, Defendants Chris Sides and Dave Hina told Phillip Williams at the Paint Spot to not to sell to the Plaintiffs or that he would lose his job.

36. Plaintiffs also learned that Defendant National Sales Manager Joeseph Smith was telling Chris Sides and Dave Hina initially to forbid dealers from selling PPG products at special prices to Plaintiffs (Namely Eugene Baird). Plaintiffs were also informed by Dealers and Merchants that Joeseph Smith, Chris Sides and Dave Hina made threats to them (Namely Rozar Auto Paint Supply, Inc. and the Paint Spot) to not sell any PPG products to Plaintiffs or there would be consequences.

37. Plaintiffs were told during sometime between 2012 and 2015 by Tim Junkin at Rozar Auto Paint Supply, Inc. and Phillip Williams at the Paint Spot, that PPG and other Defendants threatened to stop supplying products from Georgia and/or other locations if they sell to the Plaintiffs. They were specifically told by PPG and other Defendants there would consequences if they sold to Eugene Baird. Plaintiffs were told by Rozar Auto Paint Supply, Inc. and The Paint Spot that there will be consequences if they defy PPG by selling to Plaintiffs.

38. Plaintiffs were told by the merchants and dealers that they had no choice but to not sell or transact any business deal involving PPG products with the Plaintiffs. They explained they have too much invested in PPG products, depend on them tremendously in their business and could not afford to lose those products for their business. Tim Junkin at Rozar Auto Paint Supply, Inc. and Phillip Williams at the Paint Spot specifically told Plaintiffs that PPG and other Defendants (Dave Hina and Chris Sides) threatened them that if they sell to the Baird they would be cut off from being supplied PPG products.

39. As a result of the Merchants being coerced into not transacting PPG products with the Plaintiffs, the Plaintiffs have experienced a dramatic decline in business. Plaintiffs have lost several clients, business revenue and profit as result of the inability to buy and sell PPG products from other dealers and merchants.

40. Plaintiffs contend that the Defendants employed a common scheme, plan, and enterprise, intentionally and purposely, to limit PPG products to the Plaintiffs for purchase and resale.

41. Plaintiffs further contend that Defendants have engaged in a common pattern to use threats and coercive acts to discourage other merchants from doing business with Plaintiffs.

42. Plaintiffs aver Defendants did commit two (2) or more of the offenses as set out herein in a manner which they calculated and premeditated intentionally to threaten continuity of their racketeering activities.

43. Plaintiffs contend that Defendants engaged in acts that did not substantially benefit the Defendants but did substantially harm the Plaintiffs business, calling, career, financial condition, reputation, and/or personal relationships. More specifically that Plaintiffs' business has lost profits, revenues, clients and relationships with multiple merchants.

44. Plaintiffs contend that Defendants engaged or agreed with other persons or corporations, to enter, directly or indirectly, into any combination, pool, trust, or confederation to regulate or fix the price of any article or commodity to be sold or produced within the state of Alabama by limiting the quantity of PPG products and attempting to sell products to Plaintiffs for an increased price or not at all.

45. Plaintiffs contend that Defendants did in fact participate as a member or party to a pool agreement, combination, or confederation to fix or limit the quantity of articles or commodity to

be produced, manufactured or sold in this state by limiting the quantity of PPG products and attempting to sell products to Plaintiffs for an increased price or not at all.

46. Plaintiffs aver that Defendants have engaged in a scheme and course of conduct designed to adversely affect Plaintiffs' business to further bolster Defendants' monopoly in the retail paint, paint materials, paint-related products and surface products retail industry. More specifically that Defendants have forbidden the sale of its products to the Plaintiffs, restricted or restrained free trade of the marketplace in not allowing Plaintiff to purchase PPG products from other merchants and/or retailers. Such conduct was done arbitrarily, unlawfully, frivolously, wrongfully, intentionally and purposefully.

47. As a result of Defendants' unlawful conduct, Plaintiffs have been damaged or injured as a result of an unlawful trust, combine, or monopoly employed and utilized by the Defendants.

CAUSES OF ACTION

COUNT 1:

VIOLATION OF ALABAMA ANTITRUST ACT (ALA. CODE § 6-5-60)

48. Plaintiffs now re-allege each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

49. Plaintiffs allege that Defendants created an unlawful trust, combine and/or monopoly through its efforts and agreements to take business away from the Plaintiffs and to give it a monopoly in the retail distribution of paint, paint materials, surface materials, and other similarly situated products or items.

50. The actions of Defendants prevented fair and true competition and amounted to the creation of an unlawful trust, combine and/or monopoly thereby violating the public policy of Alabama as evidenced by Alabama Code §6-5-60, and thereby creating this cause of action.

WHEREFORE, Plaintiffs demand judgment against Defendant for damages, including actual and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

**COUNT II:
CIVIL CONSPIRACY**

51. Plaintiffs now re-allege each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

52. Defendants and Fictitious Defendants A-I conspired to thwart, interfere, deter, ruin or otherwise sabotage Plaintiff by participating in a scheme to severely damage, oppress, or terminate Plaintiffs' business.

53. As a proximate result of the conspiracy of Defendants, Plaintiffs have suffered damages as set forth in this Complaint.

54. Defendants consciously or deliberately engaged in oppression, fraud, wantonness or malice with regard to Plaintiffs, thereby depriving Plaintiff of legal rights and entitling him to punitive damages against Defendants.

55. Plaintiff further avers that Defendants are guilty of conduct evincing a pattern or practice of intentional misconduct or are guilty of conduct involving actual malice.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, including actual and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

**COUNT III:
TORTIOUS INTERFERENCE WITH BUSINESS**

56. Plaintiff's now re-allege each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

57. Defendants have wrongfully interfered with Plaintiff's business relations. Specifically, Defendants have interfered with Plaintiff's operations and business venture.

58. Defendants have intentionally and purposefully engaged in conduct to interfere, thwart, interrupt or adversely affect Plaintiff's profits, business, and revenue.

59. Such acts committed by the Defendants proximately caused damages to Plaintiff's.

WHEREFORE, Plaintiff's demand judgment against Defendants for damages, including actual and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

**COUNT IV:
PRICE FIXING OR LIMITING QUANTITY OF A COMMODITY VIOLATION OF § 8-10-1**

60. Plaintiff now re-alleges each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

61. Defendants did limit products made available to the market with the purposeful intent to thwart Plaintiff's.

62. Defendants did limit the quantity of products made available so to prevent Plaintiff's from having access to said products.

63. Defendants did fix the price at a higher rate to prevent or otherwise burden Plaintiff's in precluding a fair unrestrained marketplace access to PPG products.

WHEREFORE, Plaintiff's demand judgment against Defendants for damages, including actual and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

COUNT V:**ACQUISITION AND MAINTENANCE OF AN INTEREST IN AND CONTROL OF AN ENTERPRISE ENGAGED IN PATTERN OF RACKETEERING: 18 U.S.C. §§ 1961 (1) (A): Extortion, (4), (5), (9) AND 1962(a)**

64. Plaintiffs now re-allege each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

65. At various times and places enumerated herein, all Defendants did acquire and/or maintain, directly or indirectly, an interest in or control of a RICO enterprise of individuals who were associated in fact and who did engage in, and whose activities did affect interstate commerce, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(b).

66. During the ten (10) calendar years preceding the filing of this Complaint, all Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(b) (Prohibited activities). In particular, Defendants engaged in a pattern of oppressive and extortionate schemes.

67. Plaintiffs further alleges that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective *racketeering activities*, also in violation of the RICO law at 18 U.S.C. 1962(b) *supra*.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, including actual, treble, exemplary and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

COUNT VI:**CONDUCT AND PARTICIPATION IN A RICO ENTERPRISE THROUGH A PATTERN OF RACKETEERING ACTIVITY: 18 U.S.C. §§ 1961(5), 1962(c)**

68. Plaintiffs now re-allege each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

69. At various times and places enumerated herein, Defendants did associate with a RICO *enterprise* of individuals who were associated in fact and who engaged in, and whose activities did affect, interstate and foreign commerce.

70. Likewise, all Defendants did conduct and/or participate, either directly or indirectly, in the conduct of the affairs of said RICO enterprise through a pattern of racketeering activity, all in violation of 18 U.S.C. §§ 1961(4), (5), (9), and 1962(c). During the ten (10) calendar years preceding the filing of this Complaint, all Defendants did cooperate jointly and severally in the commission of two (2) or more of the RICO predicate acts that are itemized in the RICO laws at 18 U.S.C. §§ 1961(1)(A) and (B), and did so in violation of the RICO law at 18 U.S.C. 1962(c) (Prohibited activities); and in fact did so within three years.

71. Plaintiffs further allege that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective *racketeering activities in extortion*, also in violation of the RICO law at 18 U.S.C. 1962(c) *supra*.

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, including actual, treble, exemplary and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

**COUNT VII:
CONSPIRACY TO ENGAGE IN A PATTERN OF RACKETEERING ACTIVITY: 18
U.S.C. §§ 1961(1)-(5), 1962(d)**

72. Plaintiff now re-alleges each and every allegation as set forth above, and hereby incorporates same by reference, as if all were set forth fully herein.

73. At various times and places partially enumerated herein, all Defendants did conspire to acquire and maintain an interest in a RICO *enterprise engaged in a pattern of racketeering activity*, in violation of 18 U.S.C. §§ 1962(b) and (d).

74. At various times and places partially enumerated herein, all Defendants did also conspire to conduct and participate in said RICO enterprise through a pattern of racketeering activity, in violation of 18 U.S.C. §§ 1962(c) and (d). See also 18 U.S.C. §§ 1961(4), (5) and (9).

75. During the ten (10) calendar years preceding the filing of this Complaint, all Defendants did cooperate jointly and severally in the commission of two (2) or more of the predicate acts that are itemized at 18 U.S.C. §§ 1961(1)(A) and (B), in violation of 18 U.S.C. 1962(d).

76. Plaintiffs further allege that all Defendants did commit two (2) or more of the offenses itemized above in a manner which they calculated and premeditated intentionally to threaten continuity, i.e. a continuing threat of their respective racketeering activities, also in violation of 18 U.S.C. 1962(d) (Prohibited activities supra).

WHEREFORE, Plaintiffs demand judgment against Defendants for damages, including actual, treble, exemplary and punitive, in such a sum as a jury shall reasonably assess, including interest and all costs of these proceedings, in an amount exceeding the jurisdictional minimum of this Court.

DEMAND FOR RELIEF:

WHEREFORE, PREMISES CONSIDERED, Plaintiff, through his Counsel, pursuant to the statutory, common law authority and other applicable laws of Alabama, demands judgment against Defendants and prays:

1. That process issue, be served upon the Defendants requiring Defendants to appear and answer this complaint for the aggrieved harm or injuries as sustained by the Plaintiff.

2. That this Court adjudge and decree that the Defendants engaged in the aforementioned acts which violate Alabama Laws.
3. That this Court enters judgment against the Defendants, jointly and severally, in favor of the Plaintiff for compensatory, incidental, consequential, treble, exemplary, and punitive damages, including attorneys' fees and costs.
4. That all costs in this case be taxed against the Defendants.
5. That this Court grants Plaintiffs such other and further relief as this Court deems just and proper.


Eugene Baird, Plaintiff


Authorized Corporate Officer for Rhino Products, Inc.

STATE OF ALABAMA)
JEFFERSON COUNTY)

I, the undersigned authority, a **Notary Public**, in and for said State and County, hereby certify that Eugene Baird and the Authorized Corporate Officer for Rhino Products, Inc. whose name(s) is/are signed to the foregoing, and who are known to me, acknowledged before me on this day, that, being informed of the contents of this document, he/she/they executed the same voluntarily on the same bears date.

Given under my hand and official seal this 27th day of April, 2015.


NOTARY PUBLIC

My commission expires: April 29, 2017

Respectfully submitted,

/s/ Alex R. Hirschfield

Alex R. Hirschfield, ESQ. (HIR005)

Attorney for Plaintiffs

OF COUNSEL:

Jamieson and Hirschfield, LLC
P. O. Box 131374
Birmingham, Alabama 35203
(205) 701-1201
alex@jhlawgroup.com

Serve Defendants at the following address:

PPG Industries, Inc.
c/o Prentice Hall Corporation Sys Inc.
150 South Perry Street
Montgomery, AL 36104

Dave Hina
139 Oakley Chapel Road
New Market, AL 35761

PPG Architectural, Inc.
c/o CSC- Lawyers Incorporating SVC, Inc.
150 South Perry Street
Montgomery, AL 36104

Chris Sides
107 Chase Creek Terrace
Pelham, AL 35124

Joe Smith
National Sales Manager
One Ppg Pl 40 East
Pittsburgh, PA 15272
United States

DOCUMENT 3

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 01-CV-2015-901794.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

PPG INDUSTRIES, INC., C/O PRENTICE HALL CORP. 150 SOUTH PERRY STREET, MONTGOMERY, AL 36104

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY ALEX RYAN HIRSCHFIELD _____

WHOSE ADDRESS IS PO BOX 131374, BIRMINGHAM, AL 35213

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of EUGENE BAIRD _____

pursuant to the Alabama Rules of the Civil Procedure

Date 5/4/2015 5:21:40 PM /s/ ANNE-MARIE ADAMS _____

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716'N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☒ Certified Mail is hereby requested /s/ ALEX RYAN HIRSCHFIELD _____

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____

Server's Signature _____

Address of Server _____

Type of Server _____

Server's Printed Name _____

Phone Number of Server _____

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 01-CV-2015-901794.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

PPG ARCHITECTURAL FINISHES, INC., C/O CSC-LAWYERS, INCORP. 150 SOUTH PERRY STREET, MONTGOMERY, AL 36104

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY ALEX RYAN HIRSCHFIELD

WHOSE ADDRESS IS PO BOX 131374, BIRMINGHAM, AL 35213

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of EUGENE BAIRD
 pursuant to the Alabama Rules of the Civil Procedure

Date 5/4/2015 5:21:40 PM /s/ ANNE-MARIE ADAMS
 Clerk/Register
 JEFFERSON COUNTY, ALABAMA
 716 N. RICHARD ARRINGTON BLVD.
 BIRMINGHAM, AL 35203

☒ Certified Mail is hereby requested /s/ ALEX RYAN HIRSCHFIELD
 Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____
 _____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____

DOCUMENT 3

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 01-CV-2015-901794.00
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IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

JOSEPH SMITH, ONE PPG PL 40 EAST, PITTSBURGH, PA 15272

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY ALEX RYAN HIRSCHFIELD

WHOSE ADDRESS IS PO BOX 131374, BIRMINGHAM, AL 35213

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

☐ You are hereby commanded to serve this summons and a copy of the complaint in this action upon the defendant

☒ Service by certified mail of this summons is initiated upon the written request of EUGENE BAIRD
 pursuant to the Alabama Rules of the Civil Procedure
 Date 5/4/2015 5:21:40 PM /s/ ANNE-MARIE ADAMS
 Clerk/Register
 JEFFERSON COUNTY, ALABAMA
 716 N. RICHARD ARRINGTON BLVD.
 BIRMINGHAM, AL 35203

☒ Certified Mail is hereby requested /s/ ALEX RYAN HIRSCHFIELD
 Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____
 _____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____

DOCUMENT 3

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 01-CV-2015-901794.00
---	------------------------------------	---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

DAVE HINA, 139 OAKLEY CHAPEL ROAD, NEW MARKET, AL 35761

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY ALEX RYAN HIRSCHFIELD _____

WHOSE ADDRESS IS PO BOX 131374, BIRMINGHAM, AL 35213

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

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pursuant to the Alabama Rules of the Civil Procedure

Date 5/4/2015 5:21:40 PM /s/ ANNE-MARIE ADAMS

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716 N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☒ Certified Mail is hereby requested /s/ ALEX RYAN HIRSCHFIELD

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

In _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____

State of Alabama Unified Judicial System Form C-34 Rev 6/88	SUMMONS - CIVIL -	Case Number: 01-CV-2015-901794.00
---	------------------------------------	---

IN THE CIRCUIT COURT OF JEFFERSON COUNTY
 . EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

CHRIS SIDES, 107 CHASE CREEK TERRACE, PELHAM, AL 35124

NOTICE TO _____

THE COMPLAINT WHICH IS ATTACHED TO THIS SUMMONS IS IMPORTANT AND YOU MUST TAKE IMMEDIATE ACTION TO PROTECT YOUR RIGHTS. YOU OR YOUR ATTORNEY ARE REQUIRED TO FILE THE ORIGINAL OF YOUR WRITTEN ANSWER, EITHER ADMITTING OR DENYING EACH ALLEGATION IN THE COMPLAINT WITH THE CLERK OF THIS COURT. A COPY OF YOUR ANSWER MUST BE MAILED OR HAND DELIVERED BY YOU OR YOUR ATTORNEY TO THE OPPOSING PARTY'S ATTORNEY ALEX RYAN HIRSCHFIELD _____

WHOSE ADDRESS IS PO BOX 131374, BIRMINGHAM, AL 35213

THE ANSWER MUST BE MAILED WITHIN 30 DAYS AFTER THIS SUMMONS AND COMPLAINT WERE DELIVERED TO YOU OR A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE MONEY OR OTHER THINGS DEMANDED IN THE COMPLAINT.

TO ANY SHERIFF OR ANY PERSONNEL AUTHORIZED by the Alabama Rules of the Civil Procedure:

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☒ Service by certified mail of this summons is initiated upon the written request of EUGENE BAIRD

pursuant to the Alabama Rules of the Civil Procedure

Date 5/4/2015 5:21:40 PM /s/ ANNE-MARIE ADAMS

Clerk/Register

JEFFERSON COUNTY, ALABAMA

716 N. RICHARD ARRINGTON BLVD.

BIRMINGHAM, AL 35203

☒ Certified Mail is hereby requested /s/ ALEX RYAN HIRSCHFIELD

Plaintiff's/Attorney's Signature

RETURN ON SERVICE:

☐ Return receipt of certified mail received in this office on _____

☐ I certify that I personally delivered a copy of the Summons and Complaint to _____

_____ in _____ County, Alabama on _____ (Date)

Date _____	Server's Signature _____	Address of Server _____
Type of Server _____	Server's Printed Name _____	Phone Number of Server _____



NOTICE TO CLERK

REQUIREMENTS FOR COMPLETING SERVICE BY
CERTIFIED MAIL OR FIRST CLASS MAIL

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA
EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL

01-CV-2015-901794.00

To: CLERK BIRMINGHAM
clerk.birmingham@alacourt.gov

TOTAL POSTAGE PAID: \$38.05

Parties to be served by Certified Mail - Return Receipt Requested

PPG INDUSTRIES, INC.

Postage: \$7.61

C/O PRENTICE HALL CORP.
150 SOUTH PERRY STREET
MONTGOMERY, AL 36104

PPG ARCHITECTURAL FINISHES, INC.

Postage: \$7.61

C/O CSC-LAWYERS, INCORP.
150 SOUTH PERRY STREET
MONTGOMERY, AL 36104

JOSEPH SMITH

Postage: \$7.61

ONE PPG PL 40 EAST
PITTSBURGH, PA 15272

DAVE HINA

Postage: \$7.61

139 OAKLEY CHAPEL ROAD
NEW MARKET, AL 35761

CHRIS SIDES

Postage: \$7.61

107 CHASE CREEK TERRACE
PELHAM, AL 35124

Parties to be served by Certified Mail - Restricted Delivery - Return Receipt Requested

Parties to be served by First Class Mail

DOCUMENT 4

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
 Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee	CV:2015-901794	
Return Receipt Fee (Endorsement Required)	s/c	
Restricted Delivery Fee (Endorsement Required)	DI	
Total Postage & Fees	\$	

Sent To PPG Industries, Inc.
 Street & Apt. No.,
 or PO Box No.
 City, State, ZIP+4

PS Form 3800, July 2014 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PPG INDUSTRIES, INC.
 C/O PRENTICE HALL CORP.
 150 SOUTH PERRY STREET
 MONTGOMERY, AL 36104

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

- D. Is delivery address different from Item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, July 2013

Domestic Return Receipt

DOCUMENT 4

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee	CV-2015-901794	
Return Receipt Fee (Endorsement Required)	s/c	
Restricted Delivery Fee (Endorsement Required)	D2	
Total Postage & Fees	\$	

Sent To PPG Architectural Finishes, Inc.
 Street & Apt. No.,
 or PO Box No.
 City, State, ZIP+4

PS Form 3800, July 2014 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PPG ARCHITECTURAL FINISHES, INC.
 C/O CSC-LAWYERS, INCORP.
 150 SOUTH PERRY STREET
 MONTGOMERY, AL 36104

2. Article Number

(Transfer from service label)

7014 3490 0000 7271 4524

PS Form 3811, July 2013

Domestic Return Receipt

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from Item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail®☒ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

CV-2015-901794 s/c D2

DOCUMENT 4

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee	CV-2015-901794	
Return Receipt Fee (Endorsement Required)	s/c	
Restricted Delivery Fee (Endorsement Required)	D3	
Total Postage & Fees	\$	

Sent to: Joseph Smith
 Street & Apt. No.,
 or PO Box No.
 City, State, ZIP+4

PS Form 3800, July 2014 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

JOSEPH SMITH
 ONE PPG PL 40 EAST
 PITTSBURGH, PA 15272

2. Article Number

(Transfer from service label)

COMPLETE THIS SECTION ON DELIVERY

A. Signature

X☐ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from Item 1? ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

PS Form 3811, July 2013

Domestic Return Receipt

CV-2015-901794 s/c D3
 7014 3490 0000 7271 4531

DOCUMENT 4

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee	CV-2015-901794	
Return Receipt Fee (Endorsement Required)	s/c	
Restricted Delivery Fee (Endorsement Required)	D4	
Total Postage & Fees	\$	

Sent To: Dave Hina

Street & Apt. No.,
or PO Box No.

City, State, ZIP+4

PS Form 3800, July 2014 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DAVE HINA
 139 OAKLEY CHAPEL ROAD
 NEW MARKET, AL 35761

2. Article Number

(Transfer from service label)

CV-2015-901794 s/c D4 7014 3490 0000 7271 4548

PS Form 3811, July 2013

Domestic Return Receipt

ADDRESSEE: COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X

☐ Agent☐ Addressee**B. Received by (Printed Name)****C. Date of Delivery**

- D. Is delivery address different from item 1?** ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery**4. Restricted Delivery? (Extra Fee)**☐ Yes

DOCUMENT 4

U.S. Postal Service™
CERTIFIED MAIL® RECEIPT
Domestic Mail Only

For delivery information, visit our website at www.usps.com®.

OFFICIAL USE

Postage	\$	Postmark Here
Certified Fee	CV-2015-901794	
Return Receipt Fee (Endorsement Required)	s/c	
Restricted Delivery Fee (Endorsement Required)	DS	
Total Postage & Fees	\$	

Sent To Chris Sides

Street & Apt. No.,
or PO Box No.

City, State, ZIP+4

PS Form 3800, July 2014 See Reverse for Instructions

SENDER: COMPLETE THIS SECTION		RECIPIENT: COMPLETE THIS SECTION ON DELIVERY	
<ul style="list-style-type: none"> Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired. Print your name and address on the reverse so that we can return the card to you. Attach this card to the back of the mailpiece, or on the front if space permits. 		<p>A. Signature X <input type="checkbox"/> Agent <input type="checkbox"/> Addressee</p>	
<p>1. Article Addressed to:</p> <p>CHRIS SIDES 107 CHASE CREEK TERRACE PELHAM, AL 35124</p>		<p>B. Received by (Printed Name)</p> <p>C. Date of Delivery</p>	
<p>2. Article Number (Transfer from service label)</p> <p>CV-2015-901794 s/c DS</p>		<p>D. Is delivery address different from Item 1? <input type="checkbox"/> Yes If YES, enter delivery address below: <input type="checkbox"/> No</p>	
<p>3. Service Type</p> <p><input checked="" type="checkbox"/> Certified Mail® <input type="checkbox"/> Priority Mail Express™</p> <p><input type="checkbox"/> Registered <input checked="" type="checkbox"/> Return Receipt for Merchandise</p> <p><input type="checkbox"/> Insured Mail <input type="checkbox"/> Collect on Delivery</p>		<p>4. Restricted Delivery? (Extra Fee) <input type="checkbox"/> Yes</p>	
<p>PS Form 3811, July 2013</p>		<p>Domestic Return Receipt</p>	

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PPG INDUSTRIES, INC.
 C/O PRENTICE HALL CORP.
 150 SOUTH PERRY STREET
 MONTGOMERY, AL 36104

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X

Avery Davis

☐ Agent☐ Addressee**B. Received By (Printed Name)**

Avery Davis

C. Date of Delivery

MAY 11 2015

- D. Is delivery address different from item 1?** ☐ Yes
 If YES, enter delivery address below: ☐ No

3. Service Type☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery**4. Restricted Delivery? (Extra Fee)**☐ Yes**2. Article Number**

(Transfer from service label)

7014 3490 0000 7271 4517

DOCUMENT 5

UNITED STATES POSTAL SERVICE

AL 360

11 MAY '15

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP+4® in this box.

FILED IN OFFICE
CIRCUIT CIVIL DIVISION

MAY 13 2015

ANNE-MARIE ADAMS, CLERK

ROOM 400 JEFF. CO. COURTHOUSE

716 RICHARD ARRINGTON JR BLVD. NO

BIRMINGHAM, ALABAMA 35203

ANNE-MARIE ADAMS
CLERK



AlaFile E-Notice

01-CV-2015-901794.00

Judge: DONALD E. BLANKENSHIP

To: HIRSCHFIELD ALEX RYAN
alex@jhlawgroup.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL
01-CV-2015-901794.00

The following matter was served on 5/11/2015

D001 PPG INDUSTRIES, INC.
CERTIFIED MAIL
S/C

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL 35203

205-325-5355
anne-marie.adams@alacourt.gov

DOCUMENT 7

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

DAVE HINA

 139 OAKLEY CHAPEL ROAD
 NEW MARKET, AL 35761

2. Article Number

(Transfer from service label)

7014 3490 0000 7271 4548

PS Form 3811, July 2013

Domestic Return Receipt

RECIPIENT: COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☐ Agent☐ Addressee

B. Received by (Printed Name)

Dave HINA

C. Date of Delivery

5-12-15

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below: ☐ No

3. Service Type

☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee)

☐ Yes

CV 2015-901794 s/c df

DOCUMENT 7

UNITED STATES POSTAL SERVICE

13 MAY '15

PM 31

First-Class Mail
Postage & Fees Paid
USPS
Permit No. G-10

• Sender: Please print your name, address, and ZIP code.

**FILED IN OFFICE
CIVIL DIVISION**

MAY 14 2015

**ANNE-MARIE ADAMS
CLERK**

**ANNE-MARIE ADAMS, CLERK
ROOM 400 JEFF. CO. COURTHOUSE
716 RICHARD ARRINGTON JR BLVD. NO.
BIRMINGHAM, ALABAMA 35203**



AlaFile E-Notice

01-CV-2015-901794.00

Judge: DONALD E. BLANKENSHIP

To: HIRSCHFIELD ALEX RYAN
alex@jhlawgroup.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL
01-CV-2015-901794.00

The following matter was served on 5/12/2015

D004 HINA DAVE
CERTIFIED MAIL
S/C

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL 35203

205-325-5355
anne-marie.adams@alacourt.gov

DOCUMENT 9

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete Item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

PPG ARCHITECTURAL FINISHES INC.
 C/O CSC-LAWYERS, INCORP.
 150 SOUTH PERRY STREET
 MONTGOMERY, AL 36104

COMPLETE THIS SECTION ON DELIVERY**A. Signature**

X *Avery Harris*

☐ Agent☐ Addressee**B. Received by (Printed Name)**

Avery Harris

C. Date of Delivery

MAY 11 2015

D. Is delivery address different from Item 1?☐ Yes

If YES, enter delivery address below:

☐ No**3. Service Type**☒ Certified Mail®☐ Priority Mail Express™☐ Registered☒ Return Receipt for Merchandise☐ Insured Mail☐ Collect on Delivery**4. Restricted Delivery? (Extra Fee)**☐ Yes**2. Article Number**

(Transfer from service label)

7014 3490 0000 7271 4524



AlaFile E-Notice

01-CV-2015-901794.00

Judge: DONALD E. BLANKENSHIP

To: HIRSCHFIELD ALEX RYAN
alex@jhlawgroup.com

NOTICE OF SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL
01-CV-2015-901794.00

The following matter was served on 5/11/2015

D002 PPG ARCHITECTURAL FINISHES, INC.

CERTIFIED MAIL

S/C

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL 35203

205-325-5355
anne-marie.adams@alacourt.gov

DOCUMENT 11

SENDER: COMPLETE THIS SECTION

- Complete Items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

JOSEPH SMITH
ONE PPG PL 40 EAST
PITTSBURGH, PA 15272

COMPLETE THIS SECTION ON DELIVERY**A. Signature****X**☐ Agent☐ Addressee**B. Received by (Printed Name)****C. Date of Delivery**

D. Is delivery address different from item 1? ☐ Yes
If YES, enter delivery address below: ☐ No

3. Service Type☒ Certified Mail® ☐ Priority Mail Express®☐ Registered ☒ Return Receipt for Merchandise☐ Insured Mail ☐ Collect on Delivery**4. Restricted Delivery? (Extra Fee)**☐ Yes**2. Article Number**

(Transfer from service label)

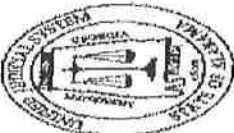
152015-901794 SC D-3
7014 3490 0000 7272 4531

PS Form 3811, July 2013

Domestic Return Receipt

DOCUMENT 11

ANNE-MARIE ADAMS, CLERK
CIRCUIT COURT OF JEFFERSON COUNTY
CIVIL DIVISION - ROOM 400
716 RICHARD ARRINGTON JR. BLVD. NORTH
BIRMINGHAM, ALABAMA 35203



FILED IN OFFICE
CIRCUIT CIVIL DIVISION

MAY 18 2015

ANNE-MARIE ADAMS
CLERK

PLACE STICKER AT TOP OF ENVELOPE TO THE RIGHT
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE

CERTIFIED MAIL



7014 3490 0000 7271 4531

RETURN TO SENDER

NO LONGER AT THIS ADDRESS

To: JOSEPH SMITH

UNKNOWN AT THIS ADDRESS

NAME NEEDED

INCORRECT ZIP CODE



AlaFile E-Notice

01-CV-2015-901794.00

Judge: DONALD E. BLANKENSHIP

To: HIRSCHFIELD ALEX RYAN
alex@jhlawgroup.com

NOTICE OF NO SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL
01-CV-2015-901794.00

The following matter was not served on 5/18/2015

D003 SMITH JOESEPH

OTHER

NO LONGER AT THIS ADDRESS

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
716 N. RICHARD ARRINGTON BLVD.
BIRMINGHAM, AL 35203

205-325-5355
anne-marie.adams@alacourt.gov

SENDER: COMPLETE THIS SECTION

- Complete items 1, 2, and 3. Also complete item 4 if Restricted Delivery is desired.
- Print your name and address on the reverse so that we can return the card to you.
- Attach this card to the back of the mailpiece, or on the front if space permits.

1. Article Addressed to:

CHRIS SIDES
 107 CHASE CREEK TERRACE
 PELHAM, AL 35124

RECIPIENT: COMPLETE THIS SECTION ON DELIVERY

A. Signature

X

☒ Agent☐ Addressee

B. Received by (Printed Name)

C. Date of Delivery

D. Is delivery address different from item 1? ☐ YesIf YES, enter delivery address below. ☐ No

3. Service Type

- ☒ Certified Mail® ☐ Priority Mail Express™
☐ Registered ☒ Return Receipt for Merchandise
☐ Insured Mail ☐ Collect on Delivery

4. Restricted Delivery? (Extra Fee) ☐ Yes

2. Article Number

(Transfer from service label)

7034 3490 0000 727J 4555

PS Form 3811, July 2013

Domestic Return Receipt



ANNE-MARIE ADAMS, CLERK
CIRCUIT COURT OF JEFFERSON COUNTY
CIVIL DIVISION - ROOM 400
716 RICHARD ARRLINGTON JR. BLVD. NORTH
BIRMINGHAM, ALABAMA 35203

FILED IN OFFICE
CIRCUIT CIVIL DIVISION
MAY 28 2015
ANNE-MARIE ADAMS
CLERK

TO: CHRIS SIDES
107 CHASE CREEK TERRACE
PELHAM, AL 35124

PLACE STICKER AT TOP OF ENVELOPE TO THE "POST"
OF THE RETURN ADDRESS. FOLD AT DOTTED LINE
CERTIFIED MAIL



7024 3490 0000 7271 4555

Handwritten signature/initials

Handwritten number 714

RETURN TO SENDER
NOT DELIVERABLE AS ADDRESSED
UNABLE TO FORWARD
MAY 28 2015 0000/22/15

EC: 35203010100 *0139-16989-07-43

35203010100
2312481713 R



AlaFile E-Notice

01-CV-2015-901794.00

Judge: DONALD E. BLANKENSHIP

To: HIRSCHFIELD ALEX RYAN
alex@jhlawgroup.com

NOTICE OF NO SERVICE

IN THE CIRCUIT COURT OF JEFFERSON COUNTY, ALABAMA

EUGENE BAIRD ET AL V. PPG INDUSTRIES, INC. ET AL.
01-CV-2015-901794.00

The following matter was not served on 5/26/2015

D005 SIDES CHRIS
UNDELIVERABLE
AS ADDRESSED - S/C

ANNE-MARIE ADAMS
CIRCUIT COURT CLERK
JEFFERSON COUNTY, ALABAMA
JEFFERSON COUNTY, ALABAMA
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